

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re

Case No. 14-10421-MLB

CASEY R. INGELS,

Debtor.

JOHN S. PETERSON, as Bankruptcy Trustee,

Adversary No. 14-01387-MLB

Plaintiff,

vs.

DEFENDANT'S ANSWER TO COMPLAINT  
FOR ORDER DENYING DISCHARGE

CASEY R. INGELS,

Defendant.

Casey R. Ingels, Defendant, by and through counsel, J. Todd Tracy, Jamie J.

McFarlane and The Tracy Law Group PLLC, answers the complaint as follows:

**JURISDICTION/VENUE**

1. Defendant admits paragraph 1 of Plaintiff's Complaint.
2. Defendant admits paragraph 2 of Plaintiff's Complaint.
3. Defendant admits paragraph 3 of Plaintiff's Complaint.
4. Defendant admits paragraph 4 of Plaintiff's Complaint.

DEFENDANT'S ANSWER TO COMPLAINT FOR  
ORDER DENYING DISCHARGE - 1

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### SPECIFIC ALLEGATIONS

5. Defendant admits paragraph 5 of Plaintiff's Complaint.

6. Defendant admits paragraph 6 of Plaintiff's Complaint.

7. Defendant admits paragraph 7 of Plaintiff's Complaint.

8. Defendant denies paragraph 8 of Plaintiff's Complaint. Defendant did not make a false oath.

9. Paragraph 9 of the Complaint does not make a factual allegation against the Defendant. Defendant does admit or deny Paragraph 9 of the Complaint.

### AFFIRMATIVE DEFENSES

By way of further answer to Plaintiff's Complaint, Defendant states the following affirmative defenses:

1. Failure to state a claim upon which relief can be granted;

2. Defendant reserves and asserts the defenses of waiver, estoppel, laches, contributory fault, unclean hands, and reserves the right to assert any additional defenses and counterclaims as additional facts are discovered, without waiving defenses of lack of subject matter jurisdiction, improper venue, lack of personal jurisdiction or any other valid defenses.

### PRAYER FOR RELIEF

WHEREFORE, the Defendant, having fully answered the Plaintiff's Complaint, prays for relief as follows:

1. For an order dismissing Plaintiff's Complaint with prejudice;



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**CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2014, I caused a copy of the foregoing to be served via CM/ECF on the following parties:

[kingstontrustee@hotmail.com](mailto:kingstontrustee@hotmail.com)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 9th day of October 2014, at Seattle, Washington.

                    /s/ Nancy Hunter                      
Nancy Hunter